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976 Mountain City Hwy . Elko, Nevada 89801 . (775) 738-6040

January 11, 2000

U.S. Department of Transportation
Dockets, Docket No. FAA-I 999-6673 - 3
400 Seventh Street SW
Room Plaza 401
Washington, DC 20590

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Dear Sir or Madam:

This letter is in response to Notice No. 99-21, relating to the "Certification of Screening Companies."

It is our opinion that imposing the intended monitoring requirements for air carrier employees would be an "unrealistic burden" to a charter air carrier such as ours.

It should be noted that because of the way that we operate, we rely almost entirely on contracted **ground handling services**. **We cannot possibly maintain permanent employees at the more than 100 stations from which we operate with a 5-aircraft operation, to monitor screener testing sessions.**

Over the past 13 years of operation we have been able to maintain a very high standard of aviation **security, utilizing the various security resources that we have contracted**. **We feel that adding** another expensive auditing requirement would not be in the best interests of our company, because of the economic and administrative burden that would be required.

Please be assured that we have the utmost interest in supporting all initiatives that promote **aviation security**. **Yet, we appeal to you to consider the economic and administrative burden that** such proposed rules would have on a charter air carrier such as ours.

Respectfully,

Shan L. Sparks
Director of Security